

Notice of Oral *Ex Parte* Presentation

February 22, 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: In the Matter of
Unlicensed Operation in the 3650-3700 MHz, ET Docket No. 04-151;
Additional Spectrum for Unlicensed Devices Below 900 MHz and the 3 GHz
Band, ET Docket No. 02-380; and
Amendment of the Commission's Rules With Regard to the 3650-3700 MHz
Government Transfer Band, ET Docket No. 98-237.

Dear Ms. Dortch:

On February 17, 2005, Peter Pitsch of Intel met by telephone with Office of Engineering and Technology Chief, Ed Thomas and OET Deputy Chiefs, Julius Knapp, Jim Schlichting and Alan Scrimme regarding the above proceedings. On February 18, 2005, he met by telephone with Chief of Staff Bryan Tramont regarding the above proceedings.

In the course of those meetings, Mr. Pitsch expressed Intel's continuing concern that the 3650 to 3700 spectrum, especially in the affected MSAs, should be licensed on an exclusive basis to foster efficient use of this spectrum for long range applications. He stated that the best way to foster long range, wireless broadband deployment in areas where congestion is likely is to provide the protection for QoS and business certainty

afforded by exclusivity. He stated that the goal of expediting wireless broadband deployment could be advanced by permitting rural applicants to apply for site licenses outside the MSAs during a 6 month window before the auction was held. Applications could be granted on a first come basis subject to meeting reasonable build out benchmarks. Alternatively, the spectrum outside of the MSAs could be made unlicensed.

Pursuant to Section 1.1206 of the Commission's Rules, 47 C.F.R. § 1.1206, a copy of this submission is being provided to each of the above parties. Please contact the undersigned with any questions in connection with this filing.

Respectfully submitted,

/s/ Peter K. Pitsch

Peter K. Pitsch
Intel Corporation
Director, Communications Policy

cc:

Bryan Tramont
Ed Thomas
Julius Knapp
Jim Schlichting
Alan Scrim